

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

NUCLEAR DEVELOPMENT LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 5:18-CV-01983-LCB
)	
TENNESSEE VALLEY)	ORAL ARGUMENT
AUTHORITY,)	REQUESTED
)	
Defendant.)	
)	

DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Defendant Tennessee Valley Authority (“TVA”), pursuant to Fed. R. Civ. P. 56, moves this Court to enter summary judgment in its favor on all claims asserted by Plaintiff. There is no genuine issue of material fact, and TVA is entitled to judgment as a matter of law.

In the alternative, TVA moves for entry of partial summary judgment on Plaintiff’s request for incidental reliance damages and for recovery of attorneys’ fees. There is no genuine issue of material fact, and TVA is entitled to judgment as a matter of law on these issues.

TVA has contemporaneously filed a brief in support of this motion along with supporting evidence.

Respectfully submitted,

s/ Matthew H. Lembke

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CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2020, a true and correct copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record:

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